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11 Litigation Counsel for Debtors

12 **UNITED STATES BANKRUPTCY COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **SAN JOSE DIVISION**

In re:)	Cases Jointly Administered
)	
COMMUNITY TOWERS I, LLC,)	Case No. 11-58944-SLJ-11
A Delaware Limited Liability Company,)	
Employer Tax I.D. No. 75-2456729,)	
)	
COMMUNITY TOWERS II, LLC,)	Case No. 11-58945-SLJ-11
A Delaware Limited Liability Company,)	
Employer Tax I.D. No. 75-2560662,)	
)	
COMMUNITY TOWERS III, LLC,)	Case No. 11-58948-SLJ-11
A Delaware Limited Liability Company,)	
Employer Tax I.D. No. 32-0065635,)	
)	
COMMUNITY TOWERS IV, LLC,)	Case No. 11-58949-SLJ-11
A Delaware Limited Liability Company,)	
Employer Tax I.D. No. 77-0379075,)	
)	Chapter 11
)	
Debtor(s).)	Date: August 21, 2013
)	Time: 2:00 p.m.
111 W. Saint John Street, Suite 705)	Place: United States Bankruptcy Court
San Jose, California 95113)	280 S. First Street, Room 3099
)	San Jose, CA 95113
)	Judge: Honorable Stephen L. Johnson

28 **NOTICE OF HEARING ON MOTION TO EXTEND DATE FOR TERMINATION OF AUTOMATIC STAY**

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NOTICE OF HEARING ON MOTION TO
EXTEND DATE FOR TERMINATION OF AUTOMATIC STAY

1 **PLEASE TAKE NOTICE** that a hearing will be held on **August 21, 2013 at 2:00 p.m.**, at
2 the United States Bankruptcy Court, 280 S. First Street, Room 3099, San Jose, CA 95113, before the
3 Honorable Stephen L. Johnson, United States Bankruptcy Judge, to consider the MOTION TO
4 EXTEND DATE FOR TERMINATION OF AUTOMATIC STAY (the "Motion") filed by Community Towers
5 I, LLC, Community Towers II, LLC, Community Towers III, LLC and Community Towers IV,
6 LLC, the debtors and debtors in possession herein (collectively, the "Debtors").

7 **PLEASE TAKE FURTHER NOTICE** that the Motion requests that the Court enter an
8 Order extending the expiration date of the automatic stay previously set by the Court for September
9 1, 2013, to December 31, 2013. The Motion is based on this Notice, on the Motion itself and on the
10 DECLARATION OF JOHN L. FEECE IN SUPPORT OF MOTION TO EXTEND DATE FOR TERMINATION OF
11 AUTOMATIC STAY, the DECLARATION OF DONN BYRNE IN SUPPORT OF MOTION TO EXTEND DATE
12 FOR TERMINATION OF AUTOMATIC STAY, the DECLARATION OF DOUG FEECE IN SUPPORT OF
13 MOTION TO EXTEND DATE FOR TERMINATION OF AUTOMATIC STAY, and the DECLARATION OF ERIC
14 MOGENSEN IN SUPPORT OF MOTION TO EXTEND DATE FOR TERMINATION OF AUTOMATIC STAY, all
15 of which are filed concurrently herewith. As set forth in the Motion, the Debtors believe that
16 conditions and their business operations have evolved so that they are now able to propose and likely
17 confirm a plan for their reorganization. Accordingly, they respectfully request an extension of the
18 date on which the automatic stay will terminate in order to allow them additional time to seek
19 confirmation of the Amended Plan¹, or to obtain financing or a sale of the property to satisfy the
20 secured claim of CIBC.

21 **PLEASE TAKE FURTHER NOTICE** that Rule 9014-1(b)(2) of the Local Bankruptcy
22 Rules of the United States Bankruptcy Court for the Northern District of California ("B.L.R.")
23 prescribes the procedures to be followed in this matter. Pursuant to B.L.R. 9014-1(c)(1), oppositions
24 to the Motion, if any, must be filed and served at least 14 days prior to the actual scheduled hearing
25 date, or **August 7, 2013**. Service should be made on: (a) counsel for the Debtors, John Walshe
26 Murray and Robert A. Franklin, Dorsey & Whitney LLP, 305 Lytton Avenue, Palo Alto, CA 94301,
27 and Law Offices Of William L. Conti, William L. Conti, 100 E San Marcos Blvd #404, San Marcos,

28 ¹ Terms not separately defined herein shall have the meaning ascribed to them in the Motion.

1 CA 92069; (b) the Office of the United States Trustee, Attn: John Wesolowski, 280 South First
2 Street, Room 268, San Jose, CA 95113; and (c) counsel for secured creditor CIBC, Inc., Adam A.
3 Lewis, Morrison & Foerster LLP, 425 Market St., San Francisco, CA 94105.

4 Creditors and parties in interest who desire copies of the Motion may contact Thomas T.
5 Hwang of Dorsey & Whitney LLP, 305 Lytton Avenue, Palo Alto, CA 94301, Tel. No. (650) 857-
6 1717; email: hwang.thomas@dorsey.com.

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8 **LAW OFFICES OF WILLIAM L. CONTI**

9 and,

10 **DORSEY & WHITNEY LLP**
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12 Dated: July 23, 2013

13 By: /s/ Thomas H. Hwang
14 Thomas H. Hwang
15 Attorneys for Debtors
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